

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE CITY OF PHILADELPHIA, *et al.*,

Plaintiffs,

vs.

BANK OF AMERICA CORPORATION, *et al.*,

Defendants.

Case No. 19-cv-1608 (JMF)

~~PROPOSED~~ **STIPULATION AND ORDER REGARDING REDACTION AND
SEALING PROCESS FOR CLASS CERTIFICATION BRIEFING**

WHEREAS, on March 14, 2022, this Court entered the Parties' Joint Letter Motion Regarding Extension of Time for the Completion of Fact Discovery (Dkt. 279), which set forth the following deadlines for class certification:

- a. Plaintiffs shall file their motion for class certification and supporting expert reports no later than October 27, 2022;
- b. Defendants shall file their opposition to class certification and supporting expert reports no later than February 9, 2023;
- c. Plaintiffs shall file their reply in support of class certification no later than April 6, 2023.

WHEREAS, because of the large volume of potential redactions and sealed exhibits likely to be involved in these filings, Plaintiffs and Defendants (collectively, the "Parties") believe a modification of the procedures set forth in Rule 7 of the Court's Individual Rules of Practice in Civil Cases ("Individual Rules") would be beneficial;

NOW, THEREFORE, the Parties hereby stipulate and agree to the following proposed process for submitting proposed sealing and redactions for all class certification briefing to the Court, and jointly request that the Court order as follows:

1. The sending parties will file their papers under interim seal by the deadlines set forth above pursuant to the Court's March 14, 2022 Order (Dkt. 279), or as otherwise applicable;
2. The sending parties will serve unredacted papers on the receiving parties by the deadlines set forth above pursuant to the Court's March 14, 2022 Order (Dkt. 279);
3. The sending and receiving parties will then have the opportunity to redact the papers and exhibits, and the receiving parties will transmit the following items to the sending parties within four (4) weeks of the deadlines set forth above pursuant to the Court's March 14, 2022 Order (Dkt. 279):
 - a. Redacted copies of all papers and exhibits;
 - b. Highlighted copies of all papers and exhibits, with highlights corresponding to the redactions; and
 - c. An insert for a motion to seal justifying their proposed redactions;
4. Within five (5) weeks of the deadlines set forth above pursuant to the Court's March 14, 2022 Order (Dkt. 279), the sending parties will then file a motion to seal, along with proposed redacted copies and highlighted copies, pursuant to the procedure outlined in Rule 7 of the Court's Individual Rules. The letter motion will include the redaction justifications of the sending and receiving parties.

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IT IS SO ORDERED.

Dated: October 24, 2022

A handwritten signature in black ink, appearing to read "Jesse M. Furman", is written over a horizontal line.

HON. JESSE M. FURMAN
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK